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*Attorneys for Plaintiff United States Small Business Administration  
in its capacity as Receiver for Rocket Ventures II SBIC, L.P.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

United States Small Business Administration in ) Case No. CV-10-4425 JSW  
its capacity as Receiver for Rocket Ventures II )  
SBIC, L.P., )  
 )  
Plaintiff, )  
Caption Continued on Next Page )

1 vs.

2 Rocket Ventures II, L.P., a California limited  
3 partnership; Rocket Ventures II CEO Fund,  
4 L.P., a California limited partnership; Rocket  
5 Ventures SBIC Partners, LLC, a Delaware  
6 limited liability company; Cordusio Societa  
7 Fiduciaria Per Azioni Lozia Federico; Kenneth  
8 W. & Melissa Baldwin; Paul Cantwell; Peter  
9 Ayrton Cheese; Yves Derville; Richard S.  
10 Cuccioli; Alistair Anderson Donald; Philippe  
11 Gire; Jean-Claude Guez; Joseph Hawes &  
12 Christopher Eyden; Alan John Healey; Craig  
13 Foster Heimark; David E. Kropp; Gregory  
14 Charles Meekings; Michele Liberato; Fred  
15 Cucchi; ValorLife; Alberto Gandini; Rijete Pty.  
16 Ltd.; Christopher Stainton; Tyna Development;  
17 Thomas Tynan; Patrice Vinet; Hahei Limited;  
18 Michel Saunier; Michel Roujansky; Nigel  
19 Backwith; Justine Lumb; Andrew Middleton;  
20 Ajmair Singh Bhullar; Estate of Grant A. Dove;  
21 Luca Casiraghi; and David Mather,  
22 )  
23 Defendants.

) **STIPULATION BETWEEN**  
24 ) **DEFENDANTS JEAN-CLAUDE GUEZ,**  
25 ) **MICHELE LIBERATO, YVES**  
26 ) **DERVILLE, PHILIPPE GIRE, MICHEL**  
27 ) **ROUJANSKY, MICHEL SAUNIER,**  
28 ) **AND PATRICE VINET AND**  
1 ) **PLAINTIFF RECEIVER FOR AN**  
2 ) **ADDITIONAL TWENTY ONE DAYS**  
3 ) **TO RESPOND TO THE AMENDED**  
4 ) **COMPLAINT;**  
5 ) **[PROPOSED] ORDER**  
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16 Defendants Jean-Claude Guez, Michele Liberato, Yves Derville, Philippe Gire, Michel  
17 Roujansky, Michel Saunier, and Patrice Vinet (the "Defendants")<sup>1</sup> and Plaintiff United States Small  
18 Business Administration in its capacity as Receiver for Rocket Ventures II SBIC, L.P. ("Plaintiff  
19 Recevier"), by and through their respective counsel of record, hereby stipulate and agree as follows:

21 **WHEREAS:**

22 Plaintiff Receiver filed an Amended Complaint on January 18, 2012;

23 The parties engaged in settlement negotiations in January through May, 2012 (the "Prior  
24 Negotiations");

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26  
27  
28 <sup>1</sup> By entering this stipulation, the above-named Defendants do not waive any potential objections to personal jurisdiction or service of process.

1 During the prior negotiations, the Defendants were represented by Dewey & LeBoeuf LLP  
2 (“D&L”);  
3

4 On May 11, Defendants filed a Motion for Extension of Time to Answer or Otherwise  
5 Respond to the Amended Complaint (the “Motion,” Dkt. 63) that was granted by Order dated May  
6 22, 2012 (the “Order,” Dkt. No.71.);  
7

8 D&L closed its doors on or about May 15, 2012 and the above-named Defendants had to  
9 obtain new counsel;  
10

11 Pursuant to the Order, Defendants were given until and including June 25, 2012 to answer or  
12 otherwise respond to the Amended Complaint;  
13

14 On June 14, 2012, the above-named Defendants retained Neal Wolf & Associates, LLC  
15 (“NW&A”) to represent them in this matter;  
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17 The parties are currently involved in settlement discussions to resolve the claims against the  
18 above-named Defendants;  
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20 **NOW, THEREFORE,**  
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22 The above-named Defendants and Plaintiff Receiver hereby agree that the time for the above-  
23 named Defendants to respond to the Amended Complaint shall be extended twenty-one days and the  
24 above-named Defendants shall have up to, and including, July 16, 2012 to respond to the Amended  
25 Complaint.  
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27 **IT IS SO STIPULATED:**  
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29 Dated: June 22, 2012

30 Neal Wolf & Associates, LLC

31 By: /s/ Neal L. Wolf  
32 Neal L. Wolf

33 Attorney for Defendants Jean-Claude Guez, Michele  
34 Liberato, Yves Derville, Philippe Gire, Michel  
35 Roujansky, Michel Saunier, and Patrice Vinet  
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1  
2 Dated: June 22, 2012  
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Schnader Harrison Segal & Lewis LLP

4 By: /s/ T. Scott Tate  
5 T. Scott Tate

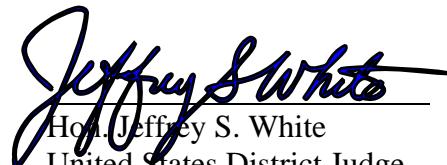
6 *Attorneys for Plaintiff*  
7 *United States Small Business Administration in Its*  
8 *Capacity as Receiver for Rocket Ventures II*  
9 *SBIC, L.P.*

10 Pursuant to General Order No. 45 § X.B., the filer attests that  
11 concurrence in the filing of this document has been obtained from the  
12 above signatory.

13 **[Proposed] ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED:  
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16 Dated: June 26, 2012  
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18   
19 Hon. Jeffrey S. White  
20 United States District Judge  
21 Northern District of California  
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